

AO 91 (Rev. 11/11) Criminal Complaint

FILED
 United States District Court
 Albuquerque, New Mexico

Mitchell R. Elfers
 Clerk of Court

UNITED STATES DISTRICT COURT
 for the

United States of America
 v.
 Steven Williams
 DOB:XX/XX/1994

Case No. 23-MJ-304

 Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of February 11 to February 13, 2023 in the county of Rio Arriba in the
 _____ District of New Mexico, the defendant(s) violated:

<i>Code Section</i>	<i>Offense Description</i>
18 U.S.C. 1153	Offenses Committed in Indian Country
18 U.S.C. 113(a)(3)	Assault with a Dangerous Weapon
18 U.S.C. 113(a)(8)	Assault of a Spouse, Intimate Partner or Dating Partner by Strangling or Suffocating

This criminal complaint is based on these facts:
 See attached affidavit.

☒ Continued on the attached sheet.

 Complainant's signature

Alyson Berry, FBI Special Agent
 Printed name and title

Telephonically sworn and electronically signed.

Date: February 16, 2023

 Judge's signature

City and state: Albuquerque, NM

B. Paul Briones, U.S. Magistrate Judge
 Printed name and title

AFFIDAVIT IN SUPPORT OF
CRIMINAL COMPLAINT AND ARREST WARRANT

I, Alyson Berry, being duly sworn, state as follows:

INTRODUCTION AND AGENT BACKGROUND

1. This affidavit is made in support of a Criminal Complaint and an Arrest Warrant for Steven Williams, (referred to herein as "WILLIAMS"), year of birth 1994.

2. I am a Special Agent with the United States Department of Justice, Federal Bureau of Investigation (FBI) and have been employed as such since July 2020. I am currently assigned to the Albuquerque Division of the FBI, Farmington Resident Agency. I have primary investigative responsibility for investigating crimes that occur in Indian Country, including violent crimes such as murder, robbery, arson, aggravated assault, and sexual assault. As a Federal Agent, I am authorized to investigate violations of the laws of the United States and have authority to execute arrest and search warrants issued under the authority of the United States.

3. This affidavit is based upon information reported to me by other federal, state, and tribal law enforcement officers during the course of their official duties. Throughout this affidavit, reference will be made to law enforcement officers. Law enforcement officers are those federal, state, and tribal law enforcement officers who have directly participated in this investigation.

4. Based on my training, experience, and the facts set forth in this affidavit, I believe there is probable cause that violations of federal criminal statutes 18 U.S.C. § 1153 Crimes Committed in Indian Country, 18 U.S.C. § 113(a)(3), Assault with a Dangerous Weapon and 18 U.S.C. § 113(a)(8), Assault of an Intimate Partner by Strangling were committed by WILLIAMS.

5. Because this affidavit is submitted for the limited purpose of securing authorization for a Criminal Complaint and Arrest Warrant, I have not included each and every fact known to

me concerning this investigation. This affidavit is intended to show that there is sufficient probable cause for the requested warrant.

PROBABLE CAUSE

6. On February 15, 2023, the Farmington Resident Agency of the FBI was notified of a female victim being treated at San Juan Regional Medical Center (SJPMC) for injuries related to repeated assaults and strangulations that occurred from Sunday, February 11, 2023 through Wednesday, February 15, 2023. Within hours of arriving at SJPMC, your Affiant met with the victim, identified with initials J.V. and year of birth 1996 (hereinafter referred to as "JANE DOE").

7. According to JANE DOE, she and WILLIAMS were romantically involved since 2020. The two share a nine-month-old son together, and JANE DOE is currently five months pregnant. WILLIAMS and JANE DOE were alone at JANE DOE's grandmother's house for several days while JANE DOE's family was traveling.

8. On February 11, 2023, WILLIAMS began hallucinating. He falsely accused JANE DOE of cheating on him with a man that he thought repeatedly climbed through the bedroom window when he wasn't looking. He forced JANE DOE to make a list of individuals who "had it out for him," and accused her of talking to someone who was not there. WILLIAMS was hearing things. JANE DOE knew WILLIAMS drank alcohol on February 11, 2023, but she was not aware of any drug use. WILLIAMS was previously treated in mental health facilities in Texas and Oklahoma. JANE DOE was not certain of the years he was treated.

9. Over the course of the next three days, WILLIAMS broke JANE DOE's hand, strangled her twice to the point that she blacked out, and put cigarettes out in her nose and mouth. WILLIAMS punched and kicked JANE DOE's stomach while saying he was going to kill their unborn child. WILLIAMS threatened to kill JANE DOE and their son while holding a knife to

JANE DOE's neck. He threw her to the ground and slammed her head against the ground repeatedly, kneeling on her chest to keep her on the ground. WILLIAMS grabbed any liquid nearby, including Hawaiian Punch, water, and soda, pouring the liquids in JANE DOE's face until she choked. He shoved "blessing herbs" including cedar, down JANE DOE's throat. WILLIAMS believed the man that was climbing through the window was by the shed in the yard. He forced WILLIAMS outside with no shoes on to look for the man. JANE DOE convinced WILLIAMS to let her back inside. While writing the list as instructed, JANE DOE was hit with a broom by WILLIAMS. He was frustrated she was making spelling errors. JANE DOE was unable to give a specific timeline of each abuse she endured. The days blurred together for her.

10. WILLIAMS would not allow JANE DOE to leave. WILLIAMS historically broke JANE DOE's cell phones every time she got a new one, and the couple were down to one device, in WILLIAMS' control. WILLIAMS made JANE DOE call his mother and explain what was happening. JANE DOE told WILLIAMS' mother the story as WILLIAMS believed it, that a man was climbing through the window. JANE DOE knew if she did not relay the story the way WILLIAMS experienced it, he would hurt her. WILLIAMS' mother called the police to perform a welfare check on JANE DOE and the baby on Monday, February 13, 2023. Police arrived at the home, but JANE DOE was too scared to ask for help. WILLIAMS was listening to her communicate with the police.

11. On Tuesday, February 14, 2023, WILLIAMS knew JANE DOE's family was due to return home from traveling. JANE DOE purposely spread her blood around the house so her family would recognize something was wrong. On her aunt's closet, she tried to write the word "help" in blood. WILLIAMS forced JANE DOE to help him clean up before the family arrived home. He wiped up the bloody spots he found and washed the bloody bedding in JANE DOE's

grandmother's room. The couple stayed in JANE DOE's room when the family arrived home late Tuesday night. On Wednesday, February 15, 2023, the couple had an alarm set for 1:30 p.m. Their son had a doctor's appointment. JANE DOE told WILLIAMS she needed to use the restroom. She asked her grandmother for help and explained what happened. JANE DOE's grandmother locked her in the bedroom and got the baby.

12. JANE DOE and her grandmother called the police. Tribal law enforcement arrested WILLIAMS on the afternoon of February 15, 2023. He was detained at the Jicarilla Apache Police Department.

13. While interviewing JANE DOE at SJRMC, your Affiant observed several wounds on JANE DOE's body. She had severe bruising on her knees, wrists, upper arms, chest and neck. JANE DOE had defensive knife wounds on her left hand, including several small cuts on her fingers and palms, as well as larger cuts that were covered with bandages and a larger cut on her lower arm. Because a knife was held to her neck, JANE DOE had a shallow knife cut on her neck. Based on my training and experience, several indications of strangulation were observed, including bruising and scratches in the pattern of strangulation on the neck.

14. JANE DOE's grandmother's residence, 209 North Quintana Road, Dulce, New Mexico, is located within the exterior boundaries of the Jicarilla Apache Indian Reservation. This is where WILLIAMS and JANE DOE stayed for the duration of the assaults.

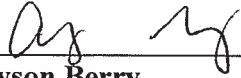
15. WILLIAMS is an enrolled member of the Caddo Nation of Oklahoma, and JANE DOE is an enrolled member of the Jicarilla Apache Indian Tribe.

CONCLUSION

16. Based on my training, experience, and the facts as set forth in this affidavit, there is probable cause to believe that violations of federal criminal statutes 18 U.S.C. § 1153 Crimes Committed in Indian Country, 18 U.S.C. § 113(a)(3), Assault with a Dangerous Weapon and 18 U.S.C. § 113(a)(8) Assault of an Intimate Partner by Strangling were committed by WILLIAMS.


17. Supervisory Assistant United States Attorney Elisa Dimas reviewed and approved this affidavit, criminal complaint, and arrest warrant of WILLIAMS.

Respectfully submitted,



Alyson Berry
Special Agent
Federal Bureau of Investigations

Subscribed and sworn telephonically and signed electronically on February 16, 2023



HONORABLE B. PAUL BRIONES
UNITED STATES MAGISTRATE JUDGE